



721 Route 202-206
Suite 200
P.O. Box 5933
Bridgewater, NJ 08807
T: 908-722-0700
F: 908-722-0755

Direct Dial: 908-252-4265
Email: jjfleischman@nmmlaw.com

November 22, 2016

The Honorable Ronnie Abrams, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square, Room 2203
New York, NY 10007

Re: Al Maya Trading Est. v. Global Export Marketing Co., Ltd.
Civil Action No. 16-CV-2140 (RA)

Dear Judge Abrams:

On behalf of respondent and cross-petitioner Global Export Marketing Co., Ltd. ("GEMCO"), we write in response to the November 21, 2016 letter from Gibson, Dunn and Crutcher on behalf of petitioner Al Maya Trading Establishment ("Al Maya").

Al Maya's letter refers to its petition to confirm the March 4, 2016 arbitration award. It, however, does not refer to GEMCO's cross-petition to vacate that award. The court should vacate the arbitration award for the reasons set forth in "memorandum of law of respondent/cross-petitioner Global Export Marketing Co., Ltd. in support of cross-petition to vacate arbitration award" filed on April 29, 2016 and "reply memorandum of law of respondent/cross-petitioner Global Export Marketing Co., Ltd. in support of cross-petition to vacate arbitration award" filed on May 26, 2016.



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Al Maya's own letter quotes authority that a court is to confirm an arbitration award unless the arbitration award should be "vacated, modified, or corrected." As discussed in GEMCO's briefs, the court should vacate the arbitration award.

Respectfully submitted,

NORRIS McLAUGHLIN & MARCUS,
P.A.

/s/ Joseph J. Fleischman
JOSEPH J. FLEISCHMAN

JJF:ja

cc: Mitchell A. Karlan, Esq. (via email)
Akiva Shapiro, Esq. (via email)